

CHARLES F. SHUPE, JR.  
and BARBARA F. SHUPE, his wife  
100 West College Terrace  
Frederick, Maryland 21701

Plaintiffs

vs.

MADALINE ALBERT  
Address Unknown

and

THE HEIRS OF MADALINE ALBERT  
Addresses Unknown

Defendants

NO. 27994 EQUITY  
IN THE  
CIRCUIT COURT  
FOR  
FREDERICK  
COUNTY  
MARYLAND

\* \* \* \* \*

BILL OF COMPLAINT TO FORECLOSE RIGHT OF REDEMPTION

Charles F. Shupe, Jr., and Barbara F. Shupe, his wife, Plaintiffs,  
by their attorneys, John H. Tisdale and Rollins, Price and Tisdale, allege:

FIRST: That they purchased at a tax sale the 10th day of November,  
1975, that parcel of real property, situate, lying and being in the Frederick  
Election District and described as Lot #17 (30 feet by 130 feet), East  
South Street, Frederick, Maryland, as evidenced by Certificate of Sale No.  
513, executed by Charlotte W. Yarroll, County Treasurer, on the 24th day  
of November 1975, which Certificate of Sale is attached hereto as Exhibit  
1.

SECOND: That Mary Alice Welty appears as the owner of the  
property on the Treasurer's tax roll and has so appeared on the tax roll  
at least since 1943.

THIRD: That in their original Bill of Complaint, filed 7 April  
1977, the Plaintiffs included Mary Alice Welty and the heirs of Mary Alice  
Welty as named Defendants.

FOURTH: That proper service has been had upon Mary Alice Welty  
and the heirs of Mary Alice Welty and that this Court has decreed that the  
rights of redemption of Mary Alice Welty and the heirs of Mary Alice Welty  
have been foreclosed.